

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

INQUIRY INTO THE USE OF CONTRACT SERVICE)
ARRANGEMENTS BY TELECOMMUNICATIONS) CASE NO.
CARRIERS IN KENTUCKY) 2002-00456

**SPRINT COMMUNICATIONS COMPANY L.P.'S RESPONSES AND
OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S
DATA REQUESTS**

COMES NOW Sprint Communications Company L.P. ("Sprint") and respectfully submits the following responses and objections to BellSouth Telecommunications, Inc.'s ("BellSouth") Data Requests to All Parties, dated April 3, 2003.

GENERAL OBJECTIONS

1.

Sprint objects to each and every one of BellSouth's Data Requests to the extent that they seek information that is not relevant to any issue in this proceeding.

2.

Sprint objects to each and every one of BellSouth's Data Requests to the extent that the requested information calls for highly proprietary Sprint business information.

3.

Sprint has interpreted BellSouth's Data Requests to apply to Sprint's regulated Kentucky intrastate operations. To the extent that BellSouth seeks to discover matters other than intrastate operations subject to the jurisdiction of the Kentucky Public Service

Commission, Sprint objects to such Data Requests as overly broad, unduly burdensome and irrelevant.

RESPONSES AND SPECIFIC OBJECTIONS

1. Please identify each county within Kentucky where you currently provide local and/or intraLATA service (whether by resale, owned facilities, UNEs or otherwise).

RESPONSE: Sprint objects to this Data Request on the grounds that it is irrelevant to the issues in this proceeding. In its Order, dated December 19, 2002, the Commission established the above-styled docket to “investigate pricing practices in regard to CSAs.” Accordingly, the request is irrelevant to the scope of the proceeding as articulated by the Commission. The request is also irrelevant with regard to Sprint’s competitive local exchange carrier (“CLEC”) operations because Sprint CLEC has not entered into any contract service arrangements in Kentucky. Without waiving its objections, Sprint refers BellSouth to its approved Kentucky CLEC tariff, at Section 3.1 (“Exchange Areas”).

2. Please identify which of the following service categories you provide in the counties you named in question 1.

Business and/or Residential Dial Tone Services of the type represented by the following non-exhaustive list:

**Plain Old Telephone Services (POTS)
Business Trunk Type Services
Primary Rate ISDN (PRI) and Basic Rate ISDN (BRI)
Centrex Type Services**

Data Type Services of the type represented by the following non-exhaustive list:

**IP Based Data Service
Packet Data Service
Primary Rate ISDN
Private Line Services**

RESPONSE: Sprint objects to this Data Request on the grounds that it is irrelevant to the issues in this proceeding. In its Order, dated December 19, 2002, the Commission established the above-styled docket to “investigate pricing practices in regard to CSAs.” Accordingly, the request is irrelevant to the scope of the proceeding as articulated by the Commission. The request is also irrelevant with regard to Sprint’s competitive local exchange carrier (“CLEC”) operations because Sprint CLEC has not entered into any contract service arrangements in Kentucky. Sprint further objects in that the request calls for Sprint proprietary business information. To permit BellSouth to have access to Sprint’s commercially sensitive business information would bestow an unfair commercial advantage on one of Sprint’s competitors, and disadvantage Sprint in the Kentucky telecommunications market. Without waiving its objections, Sprint refers BellSouth to its approved Kentucky tariffs on file with the Commission regarding the types of services Sprint is authorized to provide to end-users in Kentucky.

3. Of the services you provide in Kentucky, what is the percent split by access lines between business and residential?

RESPONSE: Sprint objects to this Data Request on the grounds that it is irrelevant to the issues in this proceeding. In its Order, dated December 19, 2002, the Commission established the above-styled docket to “investigate pricing practices in regard to CSAs.” Accordingly, the request is irrelevant to the scope of the proceeding as articulated by the Commission. The request is also irrelevant with regard to Sprint’s competitive local exchange carrier (“CLEC”) operations because Sprint CLEC has not entered into any contract service arrangements in Kentucky. Sprint further objects in that the request calls for Sprint proprietary business information. To permit BellSouth to have access to

Sprint's commercially sensitive business information would bestow an unfair commercial advantage on one of Sprint's competitors, and disadvantage Sprint in the Kentucky telecommunications market.

4. Of the service you provide in Kentucky, what is the percent split by revenue between business and residential service?

RESPONSE: See response to request no. 3, above.

5. What percent of your customers purchase services from your company at your filed tariff rates and conditions?

RESPONSE: Sprint CLEC has not entered into any contract service arrangements in Kentucky. Accordingly, all of Sprint's Kentucky CLEC customers purchase services from Sprint at the filed tariff rates and conditions.

6. Does your company sell its services through a company sales force, agents, or both?

RESPONSE: See response to request no. 3.

Respectfully submitted this 15th day of April, 2003.

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of Sprint Communications Company L.P.'s Responses and Objections to BellSouth Telecommunications, Inc.'s Data Requests in Case No. 2002-00456 was served on the following parties of record via United States First Class Mail, properly addressed and postage prepaid, on this 15th day of April, 2003.

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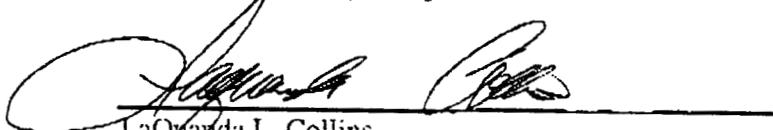
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